

5

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERICA CRABB,

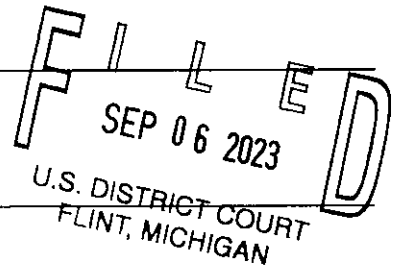
Defendant.

Case: 4:23-cr-20509  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 09-06-2023  
SEALED MATTER (tt)

---

**INDICTMENT**

---



**THE GRAND JURY CHARGES:**

**GENERAL ALLEGATIONS COUNT ONE - THREE**

1. From on or about August 24, 2009, and continuing until on or about October 26, 2018, in the Eastern District of Michigan, ERICA CRABB devised and intended to devise a scheme to defraud and to obtain money by means of materially false and fraudulent pretenses and representations.

**COUNT ONE**

**Wire Fraud (18 U.S.C. § 1343)**

2. On or about April 14, 2017, in the Eastern District of Michigan, ERICA CRABB, for the purpose of executing her scheme, transmitted and caused to be transmitted by means of wire communication in interstate commerce a writing and

signal, specifically, an electronic funds transfer in the amount of \$10,258.23, all in violation of Section 1343 of Title 18 of the United States Code.

**COUNT TWO**  
**Wire Fraud (18 U.S.C. § 1343)**

3. On or about May 22, 2017, in the Eastern District of Michigan, ERICA CRABB, for the purpose of executing her scheme, transmitted and caused to be transmitted by means of wire communication in interstate commerce a writing and signal, specifically, an electronic funds transfer in the amount of \$10,711.38, all in violation of Section 1343 of Title 18 of the United States Code.

**COUNT THREE**  
**Wire Fraud (18 U.S.C. § 1343)**

4. On or about October 23, 2017, in the Eastern District of Michigan, ERICA CRABB, for the purpose of executing her scheme, transmitted and caused to be transmitted by means of wire communication in interstate commerce a writing and signal, specifically, an electronic funds transfer in the amount of \$11,982.21, all in violation of Section 1343 of Title 18 of the United States Code.

**FORFEITURE ALLEGATION**  
**(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))**

The allegations contained in Counts One, Two, and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging

forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a); Title 18, United States Code, Section 981(a)(1)(C); and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Section 1343 set forth in Counts One, Two, or Three of this Indictment, the defendant, Erica Crabb, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided

without difficulty, the United States of America shall be entitled to forfeiture of

substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

**THIS IS A TRUE BILL.**

Dated: September 6, 2023

s/GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/ANTHONY P. VANCE  
ANTHONY P. VANCE (P61148)  
Assistant United States Attorney  
Chief, Branch Offices

s/JULES M. DePORRE  
JULES M. DePORRE (P73999)  
Assistant United States Attorney  
600 Church Street  
Flint, Michigan 48502-1280  
Telephone (810) 766-5177  
Jules.DePorre@usdoj.gov

**Companion Case information MUST be completed by AI**United States District Court  
Eastern District of Michigan**Criminal Case Cov**Case: 4:23-cr-20509  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 09-06-2023  
SEALED MATTER (tt)  
in all respects.

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to comp

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. ERICA CRABBCounty where offense occurred : GENESEECheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 6, 2023

Date



Jules M. DePore  
Assistant United States Attorney  
210 Federal Building  
600 Church Street  
Flint, Michigan 48502  
Telephone: (810) 766-5177  
Email: Jules.DePore@usdoj.gov  
P73999

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.